

EXHIBIT 7



Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Date: December 20, 2016

Case: de Reyes, et al. -v- Waples Mobile Home Park Limited
Partnership, et al.

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1 everybody else is safe. So the long and short of it
2 is I think it's part of the whole package. And it
3 became more so when Congress made the changes and
4 made it illegal to give anybody work unless they
5 were here legally. So you kind of look at the broad
6 sweep of this stuff and you say is this a -- you
7 know, is it unusual to do that. And I don't think
8 it is. I think it's a consistent, thoughtful
9 policy.

10 Q Isn't it true that asking for immigration
11 documents from the U.S. government helps a landlord
12 verify the identity of an applicant or tenant?

13 A Yeah. As a matter of fact, in most cases
14 you have to get decent third-party verification, and
15 government documents is -- are among the gold
16 standards in terms of decent third-party
17 documentation. You might recall, I don't know, I
18 guess three hours ago when we started this, Joy
19 mentioned, you know, can you take pay stubs. Well,
20 you do it, but it's a very desperate last measure
21 because you want better justification than that and
22 you want something that's a more secure document if

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1 you can get it.

2 Q Isn't it true that the U.S. government
3 vets -- let me rephrase. Isn't it true that when a
4 person obtains immigration documents from the U.S.
5 government, the U.S. government vets their
6 background?

7 MS. ODOM: Objection, foundation.

8 MR. deBETTENCOURT:

9 Q You may answer.

10 A I assume so. I don't believe they issue
11 documents just on somebody's say-so. I'm not
12 intimately familiar with the level of backgrounding
13 they do, but, you know (inaudible) --

14 (At which time the court reporter requested
15 clarification regarding the answer.)

16 THE WITNESS: Mr. deBettencourt, why don't
17 you try asking the question again and we'll start it
18 all over and she can just dump that section.

19 MR. deBETTENCOURT:

20 Q Isn't it true that when someone applies for
21 immigration documents from the U.S. government, the
22 U.S. government vets their background?